

EXHIBIT A



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April 12, 2021

VIA ELECTRONIC MAIL

George T. Williamson, Esq.
Farr Law Firm
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Re: *In Re: Valsartan Products Liability Litigation*, MDL No. 2875

Dear George:

This letter is on behalf of Defendants to address the status of depositions and discovery relating to the bellwether plaintiffs.

Bellwether Plaintiff Deposition Dates

As you are aware, Defendants requested deposition dates for ten bellwether plaintiffs on February 2, 2021. *See* Letter from Greenberg Traurig to Pl's Counsel, dated February 2, 2021. Those depositions are now underway, and we would like to move forward with scheduling the remaining plaintiffs for deposition. Please provide proposed deposition dates for the remaining plaintiffs no later than April 20, 2021.¹ Please also provide an attorney contact for each plaintiff for purposes of coordinating logistics and scheduling. We expect you will forward this letter on to the appropriate counsel representing these plaintiffs.

Plaintiff	Plaintiff's Counsel
Joe Briones	Mueller Law Office
Janice Brown	Daniel Nigh Levin Papantonio
Nellie Dawson	Paige Boldt Watts Guerra LLP
Lana Dufrene	Gainsburgh, Benjamin, David, Meunier & Warshauer, LLC

¹ Our ability to agree on the dates is subject to whether there are enough records collected to proceed with the depositions on the proposed dates.

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Robert Garcia	Ellen Presby
Maxine Guillory	Daniel Nigh Levin Papantonio
Nabil Hanna	Mueller Law Office
Paulette Kennedy	Hollis Law Firm
Silvano Kinkela	Davis & Crump, P.C.
Robert Lee	Linville Johnson, PLLC
Ronald Meeks	Daniel Nigh Levin Papantonio
Georgia Murawski	Goldenberg Law
Marvella Ochs	Oliver Law Group
Evons Smalls	Daniel Nigh Levin Papantonio
James Stephens	Williams Hart
James Suits	Harrison Davis Steakley Morrison Jones PC
Michael Svebek	Davis and Crump
Durl Welch	Paige Boldt Watts Guerra LLP

DFS & Rule 34 Discovery

Plaintiffs have requested that the DFSs be completed at all levels at least seven (7) days prior to a bellwether plaintiff deposition. *See* Pl's CMC Submission, dated March 23, 2021. The parties are continuing to confer on this issue. *See* electronic correspondence between Mr. Nigh and Greenberg Traurig, dated April 5 and 6, 2021. As noted in our April 6, 2021 email to Mr. Nigh, Defendants are willing to agree to this proposal so long as Plaintiffs likewise agree that they will respond to any bellwether plaintiff case-specific discovery requests within fourteen (14) days of service. Please confirm you are amenable to this agreement.

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Treating Physician Deposition Protocol

Defendants would like to begin scheduling the depositions of the bellwether plaintiffs' prescribing and treating physicians. Defendants will send Plaintiffs a proposed case management order addressing communications with, and depositions of, Plaintiffs' prescribing and treating physicians.

Sincerely,

A handwritten signature in blue ink, appearing to read "Victoria Davis Lockard", with a long horizontal flourish extending to the right.

Victoria Davis Lockard, Esq.

Cc:

Paige Boldt, Esq. (via email)
pboldt@wattsguerra.com

Daniel Nigh, Esq. (via email)
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